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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10
11 MARGARET MARTINEZ, individually
and on behalf of all others similarly
12 situated,

13 Plaintiff,

14 vs.

15 HOPE CREDIT, LLC,

16 Defendant.
17
18

Case No.: 2:23-cv-01003-BNW

NOTICE OF ERRATA
REGARDING THE PARTIES JOINT
STIPULATION [ECF 19]

19 **TO THE COURT AND TO ALL INTERESTED PARTIES AND THEIR**
20 **ATTORNEYS OF RECORD:**

21 PLEASE TAKE NOTICE that Plaintiff MARGARET MARTINEZ
22 (“Plaintiff”) hereby respectfully submits this Notice of Errata as to the Parties Joint
23 Stipulation [ECF 19] filed in the above-captioned matter on May 28, 2024. A correct
24 and accurate copy of Joint Stipulation is attached.

25 Dated: May 29, 2024

KAZEROUNI LAW GROUP, APC

26
27 BY: /s/ GUSTAVO PONCE
GUSTAVO PONCE, ESQ.
28 *Attorney For Plaintiff*

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9 **UNITED STATES DISTRICT COURT**
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11 MARGARET MARTINEZ, individually
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Case No.: 2:23-cv-01003-BNW

**NOTICE OF ERRATA REGARDING THE
PARTIES JOINT STIPULATION [ECF 19]**

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1 Plaintiff MARGARET MARTINEZ (“Plaintiff”), and Defendant HOPE
2 CREDIT, LLC (“Defendant”) (the “Parties”) hereby jointly move to extend all
3 deadlines set forth in the Joint Stipulation and Order Extending Discovery Deadlines
4 filed with this Court on March 26, 2024 (ECF No. 17) by a period of ninety (90)
5 days.

6 The Parties have exchanged initial disclosures, have propounded discovery,
7 Defendant has responded to discovery, but strongly believe that this matter will need
8 more time to flush out the discovery issues and facts. The Parties anticipate review of
9 additional documents and recordings as well as depositions from multiple third-party
10 witnesses. Due to the nature of the facts here as well as the newly discovered
11 information provided by Defendant re its discovery responses, the Parties in good
12 faith believe more time is necessary to conduct efficient discovery and for the Parties
13 to have effective conversations without expanding needles resources at this moment,
14 until that is all flushed out.

15 1. On June 29, 2023, Plaintiff filed her Complaint (ECF No. 1), against
16 Defendant.

17 2. Defendant filed its Answer to Plaintiff’s Complaint on July 26, 2023
18 (ECF No. 6).

19 3. The Parties have completed the following discovery to date:

- 20 • The Parties have exchanged initial disclosures.
- 21 • Plaintiff served Defendant with a request for production of documents,
22 request for admissions, and interrogatories on February 9, 2024.
- 23 • Defendant served its responses to Plaintiff’s request for admission on
24 February 24, 2024. The parties are currently meeting and conferring
25 regarding Defendant’s responses.
- 26 • Defendant served its responses to Plaintiff’s request for production of
27 documents and interrogatories on March 6, 2024. The parties are
28 currently meeting and conferring regarding Defendant’s responses.

- Defendant served Plaintiff with a request for production of documents, request for admissions, and interrogatories on May 7, 2024.

4. The parties still need to conduct depositions, potentially additional written discovery, serve subpoenas, conduct third-party depositions, and conduct expert discovery.

5. The additional time will allow the Parties to conduct extensive and additional fact discovery, including taking depositions, potentially additional written discovery, acquiring all documents from third-parties, resolving pending discovery issues, additional time to adequately determine whether expert discovery will be needed in this matter, and flesh out a newly discovered information discrepancy.

6. No party will be prejudiced by this Court granting this Stipulation as all Parties jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the extension will serve the ends of judicial economy.

7. Moreover, the requested extensions are not sought for the purposes of delay.

8. This is the Parties' second request to extend these deadlines.

9. Accordingly, the parties request adoption of the following deadlines:

a. Discovery Plan:

Discovery Cut-off	1/27/2025
Deadline to Disclose Expert Disclosures	09/30/2024
Deadline to Disclose Rebuttal Expert Disclosures	10/29/2024
Deadline for Class Certification	10/29/2024
Deadline to File Dispositive Motions	02/25/2025

b. Pre-Trial Order: The parties shall file a joint pretrial order no later than **3/27/2025** or thirty (30) days after the date set for filing dispositive motions. In the event that Parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court.

WHEREFORE, Plaintiff and Defendant respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

Dated this 29th day of May 2024.

KAZEROUNI LAW GROUP, APC

CORY READE DOWS & SHAFER

By: /s/ Gustavo Ponce

By: /s/ Christopher Reade

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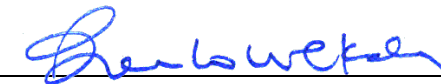
Attorneys for Defendant

Consortium Corporation d/b/a Hope

Credit LLC

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 5/29/2024

CERTIFICATION OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on May 29, 2024, the foregoing JOINT STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

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